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### REMARKS

The issues currently in the instant application are as follows:

- Claims 1 and 12 are rejected under 35 U.S.C. § 102(b) as being anticipated by US 5,852,414 (Yu).
- Claims 2-3 and 13-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over US 5,852,414 (Yu).
- Claims 4-11 are rejected under 35 U.S.C. 103(a) as being unpatentable over US 5,852,414 (Yu) in view of US 6,130,628 (Schneider-Hufschmidt).

Applicant traverses all the outstanding rejections and requests reconsideration and withdrawal thereof in light of the amendments and remarks contained herein.

#### Amendments to the Claims

Claim 1 has been amended to incorporate the subject matter of claims 4 and 6; claims 4 and 6 been canceled.

Claims 5 and 7 have been amended to update their dependencies in light of amended claim 1.

Claim 10 has been amended to update its dependency and to update its antecedent basis in light of amended claim 1.

No new matter has been added.

#### 35 U.S.C. § 102(b) - Yu

Claims 1 and 12 are rejected under 35 U.S.C. § 102(b) as being anticipated by US 5,852,414 (Yu). Claim 1 has been amended to include the subject matter of claims 4 and 6. As the Examiner has noted, Yu does not show or suggest "a priority routine that enters a character associated with the first alphanumeric label when the first key is held for less than a first toggle period and enters a character associated with the second alphanumeric label when the first key is held for more than the first toggle period." Yu

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is completely disambiguated in that a switch (FIG. 3 and FIG. 4 "alphabet / numeral activating switch") limits whether a single keypress of any non-zero length of time results in a numeral or an alphabet character. Thus, Yu does not show or suggest a priority routine to enter either a first alphanumeric character or a second alphanumeric character based on how long the first key is held relative to a toggle period. Claim 12 has been canceled. Reconsideration and withdrawal of the rejection of claims 1 and 12 under 35 U.S.C. § 102(b) as being anticipated by Yu is respectfully requested.

35 U.S.C. § 103(a) - Yu

Claims 2-3 and 13-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over US 5,852,414 (Yu). Claims 2-3 depend from amended claim 1 (discussed above), include all the limitations of amended claim 1, and thus are not unpatentable over Yu. Claims 13-21 have been canceled. Reconsideration and withdrawal of the rejection of claims 2-3 and 13-21 under 35 U.S.C. § 103(a) as being unpatentable over Yu is respectfully requested.

35 U.S.C. § 103(a) - Yu and Schneider-Hufschmidt

Claim 4-11 are rejected under 35 U.S.C. 103(a) as being unpatentable over US 5,852,414 (Yu) in view of US 6,130,628 (Schneider-Hufschmidt). As stated earlier, Yu does not disclose "a priority routine that enters a character associated with the first alphanumeric label when the first key is held for less than a first toggle period and enters a character associated with the second alphanumeric label when the first key is held for more than the first toggle period" because Yu is completely disambiguated in that a switch (FIG. 3 and FIG. 4 "alphabet / numeral activating switch") limits whether a single keypress of any non-zero length of time results in entry of a numeral or alphabet character. Because Yu is completely disambiguated, there is no need or motivation to combine a disambiguation methodology suggested in Schneider-

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Hufschmidt with the keyboard of Yu. Thus, the rejection of claims 4-11 under 35 U.S.C. 103(a) as being unpatentable over Yu and Schneider-Hufschmidt is improper.

The subject matter of claims 4 and 6 have been incorporated into independent claim 1, which is not unpatentable over Yu and Schneider-Hufschmidt as explained above. Claims 4 and 6 have been canceled. Claims 5 and 7-11 depend directly or indirectly from amended claim 1, include all the limitations of amended claim 1, and thus are not unpatentable over Yu and Schneider-Hufschmidt. Reconsideration and withdrawal of the rejection of claims 4-11 under 35 U.S.C. § 103(a) as being unpatentable over Yu and Schneider-Hufschmidt is respectfully requested.

### S U M M A R Y

The application is in condition for allowance and a favorable response at an early date is earnestly solicited. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact Applicant's representative at the telephone number indicated below.

Please charge any fees associated herewith, including extension of time fees, to Deposit Account 502117.

Respectfully submitted,

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